

# RANKIN, HILL & CLARK LLP

PATENT, TRADEMARK  
COPYRIGHT AND  
RELATED CAUSES

ATTORNEYS AT LAW  
38210 GLENN AVENUE  
WILLOUGHBY, OHIO 44094-7808  
E-mail: [bandy@rankinhill.com](mailto:bandy@rankinhill.com)

(216) 566-9700  
FAX (216) 566-9711  
[www.rankinhill.com](http://www.rankinhill.com)

February 22, 2017  
VIA COURIER MAIL AND E-MAIL

Dr. Arzhan Surazakov  
Director of Research and  
Development at CoMra-Therapy  
Radiant Life Technologies  
1st Floor  
10 Chalkokondyli St., Amara 7  
Nicosia, Cyprus CY-1071

Dr. Arzhan Surazakov  
Director of Research and  
Development at CoMra-Therapy  
Radiant Life Technologies, Ltd.  
SNP 19  
Ziar nad Hronom 965 01  
Slovak Republic  
[arzhan@radiant-life-technologies.com](mailto:arzhan@radiant-life-technologies.com)

Garrett Murrin, Regional Manager  
Radiant Life Technologies  
1st Floor  
10 Chalkokondyli St., Amara 7  
Nicosia, Cyprus CY-1071

Garrett Murrin, Regional Manager  
Radiant Life Technologies, Ltd.  
SNP 19  
Ziar nad Hronom 965 01  
Slovak Republic  
[garrett@radiant-life-technologies.com](mailto:garrett@radiant-life-technologies.com)

Avril Murrin, Representative  
Radiant Life Technologies  
1st Floor  
10 Chalkokondyli St., Amara 7  
Nicosia, Cyprus CY-1071

Avril Murrin, Representative  
Radiant Life Technologies, Ltd.  
SNP 19  
Ziar nad Hronom 965 01  
Slovak Republic  
[avril@radiant-life-technologies.com](mailto:avril@radiant-life-technologies.com)

Lloyd Moore, U.S. Technical Advisor  
Radiant Life Technologies  
1st Floor  
10 Chalkokondyli St., Amara 7  
Nicosia, Cyprus CY-1071  
[Lloydmoore@hotmail.com](mailto:Lloydmoore@hotmail.com)  
[sotirios@radiant-life-technologies.com](mailto:sotirios@radiant-life-technologies.com)

Re: Infringement of Federally Registered Trademark  
MULTI RADIANCE owned by Multi Radiance Medical Corporation

Dear All:

We represent Medical Quant USA Inc. and Multi Radiance Medical Corporation. We are contacting you personally and in your capacity as a

Dr. Arzhan Surazakov  
Garrett Murrin  
Avril Murrin  
Lloyd Moore

February 22, 2017

Re: Infringement of Federally Registered Trademark  
MULTI RADIANCE owned by Multi Radiance Medical Corporation

representative, agent, officer, and/or distributor of Radiant Life Technologies (also known as RLT).

**A. Infringement of Our Client's Trademark**

It has come to our attention that you and Radiant Life Technologies have been using our client's federally registered trademark MULTI RADIANCE® in association with your products, without consent from our client. Please note that Medical Quant USA is the owner of US Registration Number 3880197 for MULTI RADIANCE (copy of registration enclosed).

We reviewed the website for Radiant Life Technologies, i.e., [www.radiant-life-technologies.com](http://www.radiant-life-technologies.com) and noted several additional instances of unauthorized use of our client's trademark MULTI RADIANCE. Your unauthorized use of our client's mark is trademark infringement.

We also identified several unauthorized uses of our client's trademark on the website [comra-palm.com](http://comra-palm.com) and various videos and/or publications available on [YouTube.com](http://YouTube.com) published by RadiantLifeTech. Your unauthorized use of our client's mark constitutes trademark infringement.

We hereby request that you and Radiant Life Technologies immediately cease and desist from any and all current and future uses of our client's trademarks specifically including MULTI RADIANCE. In this regard, we also request that you remove all occurrences of MULTI RADIANCE and all variations thereof from the website [www.radiant-life-technologies.com](http://www.radiant-life-technologies.com); [comra-palm.com](http://comra-palm.com); and [YouTube.com](http://YouTube.com).

**B. Your Application to Register COMRA COHERENT MULTI-RADIANCES**

We identified an application to federally register in the US a purported trademark, "Comra Coherent Multi-radiances." That application was filed with the US Patent and Trademark Office (USPTO) on July 8, 2016, and assigned US Serial No. 87097841 (copy enclosed).

That application and alleged trademark uses our client's mark MULTI RADIANCE. Our client did not authorize use of its mark in this application or the alleged prior use of the mark submitted in the application.

Dr. Arzhan Surazakov  
Garrett Murrin  
Avril Murrin  
Lloyd Moore

February 22, 2017

Re: Infringement of Federally Registered Trademark  
MULTI RADIANCE owned by Multi Radiance Medical Corporation

We hereby request that you immediately expressly abandon the application, i.e., Serial No. 87097841 and forward to us copies of your filing with the USPTO of express abandonment of the application.

Please contact us in writing within ten (10) days of the date of this letter with your assurances of (i) no future occurrences of infringement of our client's intellectual property including the mark MULTI RADIANCE and US federal registration 3880197, and (ii) express abandonment of US Serial No. 87097841 for "Comra Coherent Multi-Radiances."

Sincerely,

A handwritten signature in black ink, appearing to read "Mark", with a stylized flourish extending from the end.

Mark E. Bandy

MEB:mek  
Enclosures